

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

MICHAEL W. RONDINI, et al.,

Plaintiffs,

v.

TERRY J. BUNN, JR.,

Defendant.

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Case No.: 7-17-cv-01114-RDP

PLAINTIFF’S ITEMIZED LIST OF DAMAGES SOUGHT AT TRIAL

COMES NOW, the Plaintiff, Michael W. Rondini, by and through undersigned counsel, and pursuant to the Amended Scheduling Order agreed upon by the parties (Doc. 200), submits the following itemized list of damages and equitable relief being sought at the trial:

1. Punitive damages. Pursuant to Alabama’s Wrongful Death Act, a Plaintiff can only “recover punitive, but not compensatory damages.” *Roe v. Michelin N. Am., Inc.*, 613 F.3d 1058, 1060 (11th Cir. 2010). Because Plaintiff’s suit against Defendant is for the wrongful death of Megan Rondini, Plaintiff only seeks punitive damages in the amount of \$50,000,000.00 at the trial in the above-styled case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system on this 13th day of September 2021, serving the following individuals:

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